

Exhibit 200

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

No. 1:19-md-2875-RBK
Hon. Robert Kugler

**Plaintiffs' Motion for Class Certification of
Consumer Economic Loss Claims**

DECLARATION OF JOHN R. DAVIS

I, JOHN R. DAVIS, declare:

1. I have personal knowledge of the matters set forth herein, and if called to testify thereto, I could and would do so competently.

2. Should this proceeding be certified as a class action under Fed. R. Civ. P. 23, John R. Davis of Slack Davis Sanger LLP ("SDS") is qualified to serve as class counsel for the Consumer Economic Loss Class Members. SDS is a preeminent AV-rated, nationally recognized civil litigation law firm. Founded in 1993, the firm has three offices, eleven (11) attorneys and a highly-skilled legal support staff with special expertise in managing complex cases. The firm litigates cases throughout the country in both federal and state courts.

3. John R. Davis has already been appointed by this Court to serve on the Plaintiffs' Executive Committee ("PEC") (Dkt. No. 96 (CMO No. 6)), and was appointed chair of the consumer economic loss committee as authorized by the Court in CMO 6. Mr. Davis has committed extensive time and resources to the prosecution of this MDL. Among other things, Mr. Davis led the discovery collection efforts against the Mylan Defendants, reviewing hundreds of

thousands of pages of Mylan-produced documents, meet-conferring with Mylan counsel regarding discovery disputes (and presenting argument before the Court at times), and serving as the lead deposition questioner for depositions of Mylan witnesses for eleven (11) of the seventeen (17) days of Mylan depositions to date. Aside from spearheading the discovery efforts against Mylan, Mr. Davis and his paralegal Beth Questad have also worked diligently to prepare Consumer Economic Loss Class Representatives PFSs, and prepare them for their depositions. Mr. Davis also took the deposition of Defendants' general causation expert, Dr. John Flack, and was involved in the briefing efforts of major motion practice items in this litigation including but not limited to the Motion to Dismiss briefing, Motion for Leave to Amend briefing, and *Daubert* briefing. Finally, Mr. Davis has served in a lead role in the preparation and drafting of this Motion for Class Certification.

4. Outside of this litigation, John R. Davis oversees SDS's class action practice and is a devoted specialist when it comes to federal court class action litigation. For each year from 2018 to present, Mr. Davis has been named as a Super Lawyers® Texas Rising Star in the practice area of Class Action/Mass Torts, the only Austin-based lawyer to receive such recognition. Earlier in his career before joining SDS, Mr. Davis spent several years as a federal judicial law clerk at the federal district court level.

5. Mr. Davis has been previously appointed as class counsel by federal courts across the country.

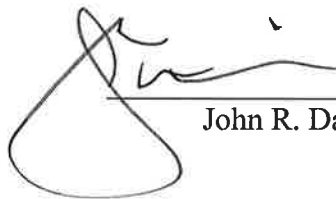
6. Most recently, in *Grigson et al. v. Farmers Group, Inc.*, No. 1:17cv88 (W.D. Tex.), the Hon. Lee Yeakel appointed Mr. Davis as class counsel in a consumer class action against Farmers Group, Inc., in which nearly 700,000 Farmers personal auto policyholders asserted class claims of unfair discrimination against the defendant insurer. The case resolved with a class settlement fund of \$52 million (of which \$12 million was approved as class counsel fees and costs), which received final court approval in June 2020. Nearly all funds have been successfully distributed to class members, and the administration of the settlement fund is close to completion.

7. Even before this litigation, Mr. Davis had developed extensive experience litigating varied claims against pharmaceutical manufacturers. Mr. Davis served as special outside counsel to the Attorney General of Louisiana and represented Louisiana in recovering tens of millions of dollars against numerous pharmaceutical manufacturers, including a landmark \$42.5 million recovery against GlaxoSmithKline involving GSK's blockbuster diabetes treatment, Avandia®. Mr. Davis was also the point attorney in litigating and settling antitrust consumer class claims in the case of *Barba et al. v. Shire U.S. Inc. et al.*, in which a multistate class settlement of approximately \$15 million was approved in the Southern District of Florida. Mr. Davis has also successfully represented whistleblowers asserting False Claims Act claims against pharmaceutical manufacturers related to healthcare fraud.

8. Mr. Davis has continuously been an attorney in good standing licensed to practice law in the States of Alabama (2010), Louisiana (2012), California (2015), and Texas (2016) and has never been the subject of a complaint or grievance in any state bar proceeding.

9. Mr. Davis has been and will continue to be willing, able, and dedicated to committing SDS's resources, including labor and expenses, to vigorously litigating this matter on behalf of the Plaintiffs named herein and the putative class members until this case reaches a final determination.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed in Austin, Texas, this 7th day of November, 2021.



John R. Davis